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Counsel for Defendant Ryan Cardenas

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

United States of America,

Plaintiff,

v.

Ryan Cardenas,

Defendants.

Case Number: CR 15-392 RS

**Joint Stipulation and ~~Proposed~~
Order Continuing December 22,
2015 Hearing Date to January 26,
2016**

**Date: December 22, 2015
Time: 2:30 p.m.**

STIPULATION

Defendant Ryan Cardenas is currently set for status hearing before the Court on December 22, 2015. Government counsel has recently extended an offer for Mr. Cardenas in this case regarding three counts of Bank Fraud in violation of 18 USC § 1344; one count of Aggravated Identity Theft in violation of 18 USC §1028A; two counts of Forged Securities in violation of 18 USC 513(a); and one count of Unlawful Possession of United States Mail. Counsel requests additional time to resolve the pending plea offer and finalize details of the plea.

Accordingly, counsel jointly request a continuance of the presently set status hearing from December 22, 2015, at 2:30 p.m., to **January 26, 2016, at 2:30 p.m.**

Additionally, the parties jointly request an exclusion of time under the Speedy Trial Act from December 22, 2015, to January 26, 2016—as failure to grant a continuance would unreasonably deny the Mr. Cardenas the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(6) and (h)(7).

SO STIPULATED.

Dated: December 17, 2015

/s/ Benjamin Kingsley
BENJAMIN KINGSLEY
Assistant United States Attorney

Dated: December 17, 2015

/s/ Candis Mitchell
CANDIS MITCHELL
Attorney for Defendant Cardenas

[Proposed] Order

For the reasons stated above, the Court continues the status hearing date from December 22, 2015, at 2:30 p.m., to **January 26, 2016, at 2:30 p.m.** Time is ordered excluded from December 22, 2015, to January 26, 2016, pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(6) and (h)(7).

SO ORDERED.

Dated: 12/18/15



Richard Seeborg
United States District Judge